

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DIGITAL MEDIA SOLUTIONS, LLC)	CASE NO. 1:19-cv-145
)	
Plaintiff,)	
)	JUDGE DAN AARON POLSTER
v.)	MAGISTRATE JUDGE
)	THOMAS M. PARKER
SOUTH UNIVERSITY OF OHIO, LLC,)	
<i>et al.</i>)	
)	
Defendants.)	

**DECLARATION OF JAYNE KENNEY IN SUPPORT OF MOTION FOR EXPEDITED
DISCOVERY OF STUDENT LOAN STIPEND DIVERSION SCHEME**

I, Jayne Kenney, pursuant to 28 U.S.C. § 1746, hereby declare:

1. I am an intervening party in the above-captioned case.
2. I have retained the National Student Legal Defense Network to represent me in seeking discovery of the diversion of my student loan stipends.
3. I was enrolled in the Psy.D. program at Illinois School of Professional Psychology, an Argosy school, until it closed in March 2019. Before the school closed, I expected to finish my coursework in the summer of 2020, and then would have had to write my dissertation, and complete an internship
4. I intend to transfer to another Psy.D. program to complete my degree.
5. In order to pay for my education and my living expenses while attending school, I borrowed money from the federal government.

6. My financial aid agreement with the federal government provides for loans in excess of what is required to pay my tuition balance and is intended to be disbursed to me as a stipend, to pay for living expenses while I attend school full-time. I should have received a stipend in the amount of approximately \$2300 from the federal government for the semester beginning January 2019. My stipend has not been disbursed. I also should have received \$2700 additional stipend from the university, from a scholarship. I also have not received that stipend.

7. The Receiver has explained in court that Argosy or its parent DCEH drew down money from the Department of Education, by certifying that my stipend and the stipends of other Argosy students had been paid, when they, in fact, had not been. The Receiver has not disclosed where or to whom that money went.

8. As a result of not receiving my stipend, I have had to take extraordinary measures to pay for my living expenses, including my rent. I have had to liquidate retirement savings and other stocks; my mother has done the same, to help me. My mother is close to retirement age, so her aid to me affects her own financial well-being.

9. I have already informed my landlord that I may be late paying my rent next month.

10. I am incurring substantial credit card debt to pay life expenses. One of my cards was closed because I am late on payments, negatively affecting my credit rating.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 27, 2019


JAYNE KENNEY